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May 23, 1990

Peter Vagt
Warzyn Engineering Inc.
2100 Corporate Drive
Addison, Illinois 60101

RE: Proposed Sediment Sampling Locations
Phase II RI, ACS NPL Site, Griffith
Indiana

Dear Dr. Vagt:

Your recent letter of May 17th proposed six (6) Phase II-Round 1 sediment sampling locations for the wetland areas associated with the ACS site. Generally, I agree with the locations which you have chosen, however, I believe that some modification of sampling locations and the total number of Phase II-Round 1 samples is necessary. I believe this is necessary to ensure that all areas of concern with respect to surface water/sediment contamination at the site will be addressed during the RI.

Several times this spring I have had the opportunity to explore the site, with the specific purpose of some of my visits being to examine the site's wetlands. During these visits, I noticed that some of the surface water features both on and off-site have persistently shown evidence of contaminant loading. Many of these surface water features have not been investigated, or not sufficiently investigated so to establish the severity of contaminant loading in these areas. The major sources of the suspected contaminants in these locations still appears to be the ACS site, thus requiring their adequate characterization.

From your letter of May 17th, my own observations, Phase I analytical data and Phase II field screening data, it is apparent that highly contaminated groundwater is discharging to the surface water and/or wetlands in several locations both on and off-site. These locations include: the wetland areas north and west of the off-site containment area (specifically in a what appears to be a groundwater discharge area south of the railroad tracks located north of this area); west of the operating portion of the ACS facility; north and west of the on-site containment area; and west-southwest of the Village of Griffith Sanitary Landfill.

The sediment sampling locations proposed in your letter tend to concentrate activities in the last two locations I have listed. However, samples are needed in the remaining areas to aid in a full characterization of site contamination. Based upon visual observations at the site and past waste-handling practices by ACS, it is suspected that these areas currently may contain highly contaminated sediments. Without the benefit of analytical data for these areas it would be extremely difficult to justify any limited action remedies for them in the FS portion of the study. Accordingly, any assumptions made on these areas in the FS without

analytical data would have to be assumed under a worst-case scenario for purposes of the FS.

My alternative proposal for addressing these areas is straightforward. One sediment sample should be taken from the ditch adjacent to the railroad tracks north of the off-site containment area. Another sample should be taken west of the ACS facility along the former drainage rill which originates from the southwest quadrant of the ACS operating facility (possibly located halfway between SD-03 and SD-07B).

To assist in preserving some sediment samples for a proposed second round of sampling, I propose that sediment sample "B" included in your proposal, be moved from its present location to the drainage rill area west of the ACS operating facility. Sediment sample "A" in conjunction with SD-07A should provide adequate data for decisions concerning any subsequent sampling in this area.

It is recognized that these modifications will require an additional sample for the area associated with the off-site containment area, and will be in excess of the number originally proposed in the Phase II Work Plan Addendum. However, in the time that has transpired between the original proposal of five sediment samples for Phase II-Round 1 (March '90) and the present, much has been observed concerning the interaction of the surface water, wetlands, groundwater and degree of contaminant loading in the subsurface (for instance, the results of the Phase II groundwater field screening revealed heavy contaminant loading from the off-site and on-site containment areas in the shallow groundwater). Accordingly, these additional two areas should be investigated in Phase II-Round 1 so that if delineation is deemed necessary in a second round of sediment sampling, the location of further sampling locations can be selected more easily.

I have included a map to aid you in identifying the additional locations to which I have referred. Please contact me if you have any questions or require further clarification.

Sincerely,

Robert E. Swale
Remedial Project Manager

Enclosure

cc: Paul Courtney, IDEM
Jim Burton, Weston